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Ofgem
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28th June 2010

Dear Gareth

**Long Term Development Statements for Electricity Distribution Networks-
Consultation on the Form of Statement**

Preamble

West Coast Energy Ltd welcomes the opportunity to comment on Form of Statement of the DNOs' Long Term Development Statements (LTDS). West Coast Energy have acted as developers and consultants to a number of major windfarm projects throughout Great Britain and have obtained consent for over 600MW of projects with a further 1000MW either going through planning or with a planning application being prepared. We have also been active participants in various electricity industry fora including the Transmission Arrangements for Distributed Generation (TADG), Transmission Access Standing Group (TASG) and in the Active Networks project team of the Distribution Working Group (DWG). We were also involved in the preparation of the new ENA connections guide for distributed generation.

General Comments

West Coast Energy has made extensive use of DNO Long Term Development Statements (LTDS) but like many other aspects of the distribution network connection process we would encourage standardisation of the DNO connection offer application requirements, processes and outputs. In particular we would agree that the LTDSs should be downloadable from DNO websites at no cost. Again we would agree that DNO's provide a schedule of the generators connected to their networks, subject to appropriate confidentiality.

While we appreciate that to include 11kV data in an LTDS would be overly onerous, given the advent of the Feed in Tariff and other small scale generation consideration should be given as to how simple amounts of data including network diagrams could be made available for at least the 11kV network. Most of the generation project developers have access to Geographical Information Systems (GIS) and no doubt all the DNOs keep their network records on GIS systems. Methods should be explored which would allow

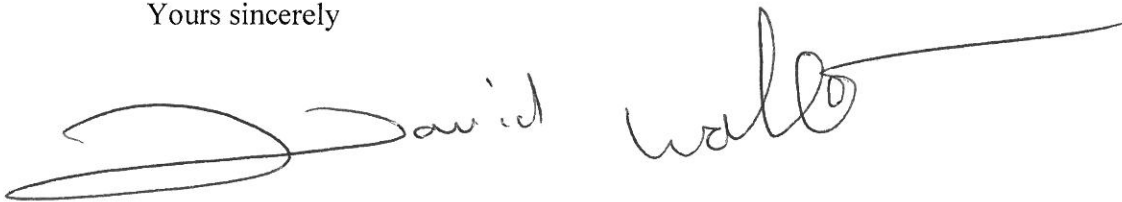
developers to access the DNO GIS systems to obtain 11kV data, particularly geographical network plans.

Comment	FOS Change Proposal	Required LTDS Output
1	Publish LTDS in a uniform format on DNO website	Standardisation and ease of use
2	Consider how to facilitate access to 11kV network plans and data.	Introduction of feed in tariff and other small scale generation

I hope you find my comments useful but if you wish to discuss them further please do not hesitate to contact me.

Kind regards

Yours sincerely

A handwritten signature in black ink, appearing to read 'David Walker', with a long horizontal flourish extending to the right.

David Walker
Head of Grid & Regulatory Affairs
West Coast Energy Ltd